COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

Application Of Kentucky Power Company)	
For (1) Authority To Amend Temporarily)	
Tariff C.S I.R.P. And Tariff E.D.R.;)	
(2) To Establish Temporarily Tariff C.S Coal;)	
(3) For Leave To Deviate From The Notice)	Case No. 2017-00099
Requirements Of 807 KAR 5:011, Section 8;)	
(4) For Related Accounting Relief; And 5) For)	
All Other Required Approvals and Relief)	

MOTION FOR LEAVE TO FILE SUBSTITUTE PARAGRAPH 52 TO APPLICATION

Kentucky Power Company applies to the Public Service Commission of Kentucky pursuant to 807 KAR 5:001, Section 5(5) to replace paragraph 52 of the Company's February 23, 2017 verified application with Substitute Paragraph 52 below:

52. Customers engaged in coal extraction and processing may nominate interruptible load in any amount, subject to a one MW minimum, up to a maximum contract load of 75,000 kW for all customers taking service under the tariff. There currently is 12,400 kW of interruptible load subject to the tariff, leaving customers the ability to nominate any portion of the balance of 62,600 kW, subject to the minimum, under the tariff. Because the amount of load to be nominated under the tariff is not knowable, it is not practicable to estimate the effect of the proposed amendment on the amounts paid by customers subject to Tariff P.P.A.

Substitute Paragraph 52 provides the interruptible load nominated under Tariff CS-IRP, as well as the balance that could be nominated under the tariff.

The verification of Matthew J. Satterwhite is attached.

WHEREFORE, Kentucky Power Company requests that the Commission issue an Order:

- (1) Replacing paragraph 52 of the verified application with Substitute Paragraph 52;
- (2) Granting the Company all relief requested in its February 23, 2017 verified application;
 - (3) Granting all other required relief or approvals.

This 9th day of March, 2017.

Respectfully submitted.

Mark R. Overstreet

Katie M. Glass

STITES & HARBISON PLLC

421 West Main Street

P.O. Box 634

Frankfort, Kentucky 40602-0634

Telephone:

(502) 223-3477

Facsimile:

(502) 223-4387

moverstreet@stites.com

kglass@stites.com

Kenneth J. Gish, Jr.

STITES & HARBISON PLLC

250 West Main Street, Suite 2300

Lexington, Kentucky 40507

Telephone:

(859) 226-2300

Facsimile:

(859) 253-9144

kgish@stites.com

COUNSEL FOR:

KENTUCKY POWER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and copy of the foregoing was served by electronic and U.S. mail upon:

Rebecca Goodman
Lawrence W. Cook
Kent Chandler
Angela M. Goad
Kentucky Attorney General's Office
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
Rebecca.goodman@ky.gov
Larry.cook@ky.gov
Kent.chandler@ky.gov
Angela.goad@ky.gov

Michael L. Kurtz
Kurt Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
mkurtz@bkllawfirm.com
kBoehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

on this the 9th day of March, 2017.

Mark R. Overstreet

VERIFICATION

The undersigned, Matthew J. Satterwhite, being duly sworn, states and deposes that he is the President and Chief Operating Officer, Kentucky Power Company, that he has personal knowledge of the matters set forth in the foregoing testimony, or knowledge gained by his review of the sources cited, and his testimony herein is true and correct to the best of his information, knowledge and belief.

Matthew J. Satterwhite

COMMONWEALTH OF KENTUCKY)	
)	SS
COUNTY OF BOYD)	

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Matthew J. Satterwhite this the 9th day of March, 2017.

Notary ID Number: 530202

My Commission Expires: 03-18-2019

(SEAL)

